

# HEDIN LLP

1395 Brickell Avenue, Suite 610  
Miami, Florida 33131-3353  
www.hedinllp.com

**Julie Holt**  
(305) 357-2107  
jholt@hedinllp.com

March 24, 2025

The Honorable Lewis J. Liman  
United States District Judge  
United States District Court for the Southern District of New York  
500 Pearl Street  
New York, NY 10007

**Re: Joint Letter-Motion to Stay Case Pending Settlement Negotiations – *Jolly v. FurtherEd Inc. d/b/a Lawline*, Case No. 1:24-cv-06401-LJL**

Dear Judge Liman,

The parties submit this Joint Letter-Motion requesting this Court stay the case, including discovery, and all current deadlines pending settlement negotiations. Currently pending are Defendant's Motion to Dismiss and Motion to Stay. Plaintiffs' responses are due March 28, and Defendant's replies are due April 18.

The parties have agreed to an early mediation and are in the process of selecting a date in April or early May. The parties agree that a stay will allow them to focus their efforts on potentially resolving this matter before undertaking additional costly and time-consuming litigation. As such, the parties agree that a stay will further the interests of judicial economy and efficiency and facilitate the final resolution of this matter. Thus, the parties request that the case be stayed until further order of the Court and that the parties provide the Court with a joint status report in 90 days indicating the outcome of the mediation.

This Letter-Motion is brought in good faith and not for purpose of undue delay. Granting the motion will not prejudice either party.

WHEREFORE, Plaintiffs and Defendant respectfully request the Court enter their proposed order attached as Exhibit A.

Thank you for considering this request.

Respectfully submitted,

/s/ Eric Kanefsky  
ERIC KANEFSKY  
CALCAGNI & KANEFSKY, LLP

/s/Julie E. Holt  
JULIE E. HOLT  
HEDIN LLP

75 BROAD STREET, SUITE 17031  
NEW YORK, NY 10004  
T. (862) 772--8149  
ERIC@CK-LITIGATION.COM

*Attorney for Defendant*

1395 BRICKELL AVE., SUITE 610  
MIAMI, FLORIDA 33131-3302  
TELEPHONE: (305) 357-2107  
FACSIMILE: (305) 200-8801  
JHOLT@HEDINLLP.COM

**ALMEIDA LAW GROUP LLC**  
MATTHEW J. LANGLEY  
NEW YORK BAR NO. 4831749  
DAVID S. ALMEIDA  
NEW YORK BAR NO. 3056520  
849 W. WEBSTER AVENUE  
CHICAGO, ILLINOIS 60614  
TEL: (312) 576-3024  
E: MATT@ALMEIDALAWGROUP.COM  
E: DAVID@ALMEIDALAWGROUP.COM

*Attorneys for Plaintiffs and the Putative Class*

**HEDINLLP**

1395 Brickell Avenue • Suite 610  
Miami, Florida 33131-3353  
(305) 357-2107 • [www.hedinllp.com](http://www.hedinllp.com)